

# EXHIBIT 20

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

Celsa M. Angulo Gómez

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO  
et al.,

Debtors.<sup>3</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

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PRIME CLERK

**NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY FOR  
CONFIRMATION OF COMMONWEALTH PLAN OF ADJUSTMENT**

If this Notice is filed on or before August 15, 2021, you may be granted access to documents in the Plan Depository, where information and documents concerning the Plan are kept, and you will also be able to serve your own discovery requests. If you file this Notice after August 15, 2021, but on or before October 19, 2021, you may be granted access to documents in the Plan Depository, but you will not be able to serve your own discovery requests. Please note that access to the information in the Plan Depository may also require complying with the Debtors' access requirements. If this Notice is filed after October 19, 2021, you will not be permitted to participate in discovery. If you do not file this Notice, you will still be able to vote on the Plan, if you are otherwise qualified to vote.

The party identified below (the "Participant") hereby advises the Debtors that it intends to participate in discovery in connection with confirmation of the Debtors' proposed Plan.

<sup>3</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

# **ATTACHMENT 1**

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Participant must provide all of the information below **in English**:

1. Participant's contact information, including email address, and that of its counsel, if any:

Participant's Name: Celsa M. Angulo Gomez  
Participant's Address: Hc 69 Box 15704 Bayamon PR 00956  
Participant's Email Address: Celsa1205@gmail.com  
Name of Counsel: O'Neill + Borges LLC  
Address of Counsel: 250 Muñoz Rivera Ave. Suite 800  
Email Address of Counsel: San Juan PR 00918-1813

2. Participant's Claim number and the nature of Participant's Claim:

Claim Number: Case No. 17-bk-03283  
Nature of Claim: Law 96 - Law 89 Case No. 17bk03566  
By: Celsa M. Angulo Gomez Puertoricoinfo@Primedclerk.com  
Signature  
Celsa M. Angulo Gomez  
Print Name

Title (if Participant is not an individual)

13 de Sept. 2021  
Date

**Instructions for Filing Notice of Participation:** If you are represented by counsel, this Notice must be filed electronically with the Court on the docket using the CM/ECF docket event Notice of Intent to Participate in Discovery for Commonwealth Plan Confirmation, in *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS, through the Court's case filing system on or before the applicable deadline. If you are not represented by counsel, you may instead mail this Notice to the Court's Clerk's Office at: United States District Court, Clerk's Office, 150 Ave. Carlos Chardon Ste. 150, San Juan, P.R. 00918-1767.



3. ***Deadline to File Notice of Intent to Participate in Discovery.*** If you wish to participate in discovery in connection with confirmation of the Plan, you must file a notice of your intention to participate in discovery (a "Discovery Notice"), and in the manner set forth in Attachment 1. If you file your Discovery Notice on or before August 15, 2021, you may be granted access to documents in the Plan Depository, where information and documents concerning the Plan are kept, see Paragraph 8 below, and will also be able to serve your own discovery requests. If you file your Discovery Notice after August 15, 2021, but on or before October 19, 2021, you may be granted access to documents in the Plan Depository. Please note that access to the information in the Plan Depository may also require complying with the Debtors' access requirements.

4. You must submit the Discovery Notice in the form set forth in Attachment 1, which must:

- a. Be in writing, in English, and be signed;
- b. State your name, address, the nature of your Claim, and your Claim number;
- c. State your intention to participate in discovery in connection with confirmation of the Plan; and
- d. Be filed electronically with the Court on the docket using the CM/ECF docket event Notice of Intent to Participate in Discovery for Commonwealth Plan Confirmation, in *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS, through the Court's case filing system on or before the applicable deadline.

- i. If you are not represented by counsel, you may instead mail your

Discovery Notice to the Court's Clerk's office at:  
United States District Court, Clerk's Office  
150 Ave. Carlos Chardon Ste. 150  
San Juan, P.R. 00918-1767

so as to be received on or before the applicable deadline.

5. **You must timely file a Discovery Notice to participate in discovery in connection with confirmation of the Plan.** Failure to timely file a Discovery Notice, however, will not preclude you from filing an objection to confirmation of the Plan on or before the confirmation Objection Deadline (as defined below), but will preclude you from being able to view documents in the Plan Depository, and from taking discovery.

6. ***Discovery Timetable and Deadlines.*** The Court has established the following discovery dates and deadlines, which are applicable to the Debtors and to other parties in interest who have timely filed a Discovery Notice and are eligible to participate in discovery:<sup>2</sup>

| Summary of Certain Deadlines |  |
|------------------------------|--|
| August 3, 2021               | Deadline for Debtors to file Preliminary Fact Witness List   |
|                              | Deadline for Debtors to file Opening Summary Brief   |
| August 6, 2021               | Opening date to serve Requests for Production of Documents (All Parties)   |
| August 15, 2021              | Deadline for Creditors to file Notice of Intent to Participate in Discovery in order to be eligible to access the Plan Depository and serve discovery requests |
| September 6, 2021            | Deadline for Creditors to file Preliminary Fact Witness List   |
|                              | Deadline to file Opening Expert Disclosures (All Parties)  |
| September 13, 2021           | Deadline to file Opening Expert Reports (All Parties)  |
| October 1, 2021              | Deadline to file Interrogatories (All Parties)   |
|                              | Deadline to file Follow-Up Production Requests (All Parties)   |
| October 4, 2021              | Deadline to file Rebuttal Expert Disclosures (All Parties)   |
| October 8, 2021              | Deadline to file Rebuttal Expert Reports (All Parties)   |
|                              | Deadline for Debtors to file Initial Proposed Confirmation Order   |
| October 11, 2021             | Deadline to file Admission Requests (All Parties)  |
|                              | Close of Fact Discovery  |

<sup>2</sup> All of the dates and procedures set forth in this notice are subject to change by further Court order.

| Summary of Certain Deadlines |  |
|------------------------------|--|
| <b>October 18, 2021</b>      | Close of Expert Discovery  |
| <b>October 19, 2021</b>      | Deadline for Creditors to file Objections to Confirmation of the Plan  |
|                              | Deadline for Creditors to file Notice of Intent to Participate in Discovery in order to access the Plan Depository           |
| <b>October 22, 2021</b>      | Deadline for Creditors to file Objections to Debtors' Initial Proposed Confirmation Order                                    |
|                              | Deadline to file Finalized Witness Lists, Exhibit Lists and Deposition Designations (All Parties)                            |
| <b>October 25, 2021</b>      | Deadline for Debtors to file Replies to Objections to Confirmation of the Plan   |
|                              | Deadline to file Witness Declarations to be used at the Confirmation Hearing (All Parties)                                   |
|                              | Deadline for Debtors to file Initial Proposed Findings of Fact and Conclusions of Law in Support of Confirmation of the Plan |
| <b>October 27, 2021</b>      | Deadline for Debtors to file Replies in Support of Proposed Confirmation Order   |
| <b>November 8, 2021</b>      | Start of Confirmation Hearing  |

7. The dates and deadlines set forth herein may be adjusted if the Disclosure Statement is approved after July 30, 2021, and under such other circumstances as may be determined by the Court. You will receive notices with additional information regarding further proceedings in connection with confirmation of the Plan after the Court makes its determination regarding the Disclosure Statement.

8. **Plan Confirmation Depository.** Information and documents relating to confirmation of the Plan are available online in the Plan Confirmation Depository at [titleiiiilandataroom.com](http://titleiiiilandataroom.com).

9. **Additional Information.** Any party in interest wishing to obtain copies of the Plan, including Spanish translations thereof, should contact Prime Clerk LLC, by telephone at (844)



822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available), or by email at [puertoricoinfo@primeclerk.com](mailto:puertoricoinfo@primeclerk.com), or may view such documents by accessing either <https://cases.primeclerk.com/puertorico/> or the Court's website, <https://www.prd.uscourts.gov/>. Please note that a Public Access to Court Electronic Records ("PACER") (<http://www.pacer.psc.uscourts.gov>) password and login are needed to access documents on the Court's website.

Dated: July 20, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

Margaret A. Dale (*pro hac vice*)

Julia D. Alonzo (*pro hac vice*)

Laura Stafford (*pro hac vice*)

**PROSKAUER ROSE LLP**

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New York, NY 10036

*Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

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250 Muñoz Rivera Ave., Suite 800

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*Co-Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*



Celsa M. Angulo  
Hc 69 Box 15704  
Bayamon PR 00956

MEMPHIS TN 380

15 SEP 2021



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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE  
**CERTIFIED MAIL®**



7020 2450 0000 4865 5437

Prime Clerk LLC  
Grand central station  
PO BOX 4708  
New York, NY 10163-4708 PRIME C

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